

## ATTORNEY GENERAL OF WASHINGTON

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November 22, 2002

Public Disclosure Commission C/o Vicki Rippie, Executive Director P.O. Box 40908 Olympia, WA 98504-0908

RE:

In re the enforcement of Protect our Pets and Wildlife

PDC No. 01-134

Dear Ms. Rippie:

On March 7, 2002, you forwarded to the Office of the Attorney General an Order of Referral with respect to the above referenced enforcement matter. In that order, the Commission found apparent multiple violations of RCW 42.17.080 and 42.17.090 by Protect our Pets and Wildlife, a political committee. The Commission also determined that in light of the facts, the Commission's penalty authority was inadequate to address the violations.

The AGO has now completed its review of the facts of the case, legal issues presented and status of the committee. It appears from the facts that the committee failed to timely report for a period of no more than 60 days a total of \$500,000 in media buys although some of those purchases did not occur until less than 30 days prior to the general election. It also appears that this was a first time committee that, when the issue was brought to its attention, immediately amended its filings so that the obligations were all reported prior to the election date. Finally, from the reports filed with the PDC, the committee appears to not being engaged in any other political activity and remains registered because of existing debts. According to the PDC website, the committee's debts are \$17,049.83.

While we agree that the violations occurred as described, in light of the facts of this case and the current status of the committee, we have determined that it is in the best interests of the State for the matter to be returned to the Commission for final adjudication. Thank you for your attention to this matter.

Very truly yours,

Linda A. Dalton

Senior Assistant Attorney General

LAD/kp

Cc: David E. Walsh, Deputy Attorney General

Nancy J. Krier, Assistant Attorney General

Susan Harris, Assistant Director - Public Disclosure Commission

Shawn Newman, Attorney for the Respondent